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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

17 | BRIAN BORENSTEIN, an individual,

Case No.: 2:19-cv-00985-APG-DJA

18 Plaintiff

**STIPULATION AND [PROPOSED]
ORDER FOR PLAINTIFF TO RESPOND
TO [ECF 68] MOTION TO DISMISS
FIRST AMENDED COMPLAINT BY
DEFENDANTS COUNTY OF CLARK
AND VICTOR ZAVALA**

20 | vs

21 THE ANIMAL FOUNDATION, a domestic
nonprofit corporation; *et al.*

Defendants.

25 COMES NOW Plaintiff, BRIAN BORENSTEIN, by and through his counsel, Raelene
26 K. Palmer, Esq. of The Palmer Law Firm, P.C., and Robert S. Melcic, Esq., and Defendants,
27 COUNTY OF CLARK, and VICTOR ZAVALA, by and through their counsel, Jonathan D.
28 Blum, Esq., of the law firm Wiley Petersen, and hereby request the Court to extend the

1 deadlines for Plaintiff to respond to [ECF 68] *Motion to Dismiss First Amended Complaint by*
2 *Defendants County of Clark and Victor Zavala* by one week from **Friday, October 2, 2020** to
3 **Friday, October 9, 2020.**

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1 This is the third request for an extension. The original deadline was August 14, 2020.
2 The parties submit that this request is made in good faith and not for the purpose of undue delay
3 but is related to caseload and calendar deadlines for Plaintiff's counsel.

4 DATED this 2nd day of October 2020.	5 DATED this 2nd day of October 2020.
6 THE PALMER LAW FIRM, P.C.	7 WILEY PETERSEN
7 By: <u>/ s / Raelene K. Palmer</u>	8 By: <u>/ s / Jonathan D. Blum</u>
8 Raelene K. Palmer, Esq.	9 Jonathan D. Blum, Esq.
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13 rpalmer@plflawyers.com	14 jblum@wileypetersenlaw.com
14 DATED this 2nd day of October 2020.	15 <i>Attorneys for Defendants, County of Clark and Victor Zavala</i>
15 By: <u>/ s / Robert S. Melcic</u>	16 Attorneys for Plaintiff Brian Borenstein
16 Robert S. Melcic, Esq.	17
17 State Bar No. 14923	
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19 Las Vegas, Nevada 89121	
20 (702) 526-4235	
21 robertmelcic@gmail.com	
22 IT IS SO ORDERED.	
23 DATED: <u>October 5</u> , 2020.	
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25	UNITED STATES DISTRICT JUDGE
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